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UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN

United States of America,

Plaintiff,

v.

Michael Anthony Kurz,

Defendant.

Case: 4:21-cr-20593

Judge: Davis, Stephanie Dawkins

MJ: Ivy, Curtis

Filed: 09-15-2021

INDI USA v SEALED MATTER (tt)

VIOLATIONS.

18 U.S.C. § 2251(a)

**INDICTMENT**

**FILED**  
SEP 15 2021  
U.S. DISTRICT COURT  
FLINT, MICHIGAN

THE GRAND JURY CHARGES:

**COUNT ONE**

**18 U.S.C. § 2251(a) - Sexual Exploitation of a Minor**

1. In or about November 2020, in the Eastern District of Michigan, and elsewhere, defendant, Michael Anthony Kurz, knowingly employed, used, persuaded, induced, enticed and coerced a minor to engage in sexually explicit conduct for the purpose of producing any visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce; using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer; and the visual depiction

was transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce.

All in violation of Title 18, United States Code, Section 2251(a).

**FORFEITURE ALLEGATION**  
**18 U.S.C. § 2253 and 28 U.S.C. § 2461**

2. The allegations contained in Count One of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to 18 U.S.C. § 2253 and 28 U.S.C. § 2461.

3. Upon conviction of one or more of the offenses charged in Count One of the Indictment, defendant shall, pursuant to Title 18, United States Code, Section 2253, and Title 28, United States Code, Section 2461, forfeit to the United States the following:

- a. Any visual depiction described in Title 18, United States Code, Sections 2251, 2251A, or 2252, 2252A, 2252B, or 2260, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped, or received in violation of these subsections;
- b. Any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offense; and
- c. Any property, real or personal, used or intended to be used to commit or to promote the commission of such offense or any property traceable to such property.

4. Substitute Assets: If the property described above as being subject to forfeiture, as a result of any act or omission of defendant:

- a. Cannot be located upon the exercise of due diligence;
- b. Has been transferred or sold to, or deposited with, a third party;
- c. Has been placed beyond the jurisdiction of the Court;
- d. Has been substantially diminished in value; or
- e. Has been commingled with other property that cannot be divided without difficulty;

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), and Title 28, United States Code, Section 2461(c).

THIS IS A TRUE BILL  
s/Grand Jury Foreperson  
\_\_\_\_\_  
GRAND JURY FOREPERSON

SAIMA S. MOHSIN  
Acting United States Attorney

s/Anthony Vance  
ANTHONY VANCE  
Chief, Branch Offices

s/Ann Nee  
ANN NEE  
Assistant United States Attorney

Dated: 9-15-2021

United States District Court  
Eastern District of Michigan

Criminal Case Cover

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NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately.

<b>Companion Case Information</b>	<b>Companion Case Number:</b>
This may be a companion case based on LCrR 57.10(b)(4) <sup>1</sup> :	
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<b>AUSA's Initials: AN</b>

**Case Title:** USA v. Michael Anthony Kurz

**County where offense occurred:** Genesee

**Offense Type:** Felony

Indictment -- no prior complaint

### Superseding Case Information

**Superseding to Case No:** \_\_\_\_\_ **Judge:** \_\_\_\_\_

**Reason:**

**Defendant Name**

**Charges**

**Prior Complaint (if applicable)**

**Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case**

September 15, 2021

Date

**s/Ann Nee**

Ann Nee  
Assistant United States Attorney  
600 Church Street  
Flint, MI 48502  
ann.nee@usdoj.gov  
(810) 766-5177

<sup>1</sup> Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.